

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

GEORGIA STATE CONFERENCE OF)	
NAACP, ET AL.)	
)	
PLAINTIFFS,)	CIVIL ACTION NO.
)	1:21-CV-5338-
V.)	ELB-SCJ-SDG
)	
STATE OF GEORGIA, ET AL.)	
)	
DEFENDANTS.)	
)	
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COMMON CAUSE, et al.,)	
)	CIVIL ACTION FILE NO.
PLAINTIFFS,)	1:22-CV-00090-
)	ELB-SCJ-SDG
V.)	
)	
BRAD RAFFENSPERGER,)	
)	
DEFENDANT.)	

**MOTION FOR PROTECTIVE ORDER
AS TO NON-PARTY SUBPOENAS**

COME NOW, John Kennedy, Bonnie Rich, the “Senate Reapportionment and Redistricting Committee,” the “House Reapportionment and Redistricting Committee,” Gina Wright, Executive Director of the Legislative and Congressional Reapportionment Office, and the Legislative and Congressional Reapportionment Office (collectively the “Movants”) and file this, their Motion for Protective Order as to the documents and testimony sought in the Subpoenas issued to Movants by

the Plaintiffs, attached hereto as Exhibits A-L and incorporated herein by this reference on the grounds that that evidence and testimony sought in the subpoenas are barred by the doctrine of legislative privilege.

In support of this Motion, Movants rely on their Brief in Support of Motion for Protective Order filed contemporaneously herewith.

WHEREFORE, Movants pray that this Court enter an Order consistent with Movants' proposal as enumerated in their accompanying Brief.

Respectfully Submitted, this 9th day of September, 2022.

/s/ Patrick D. Jaugstetter
Patrick D. Jaugstetter
Special Assistant Legislative Counsel
JARRARD & DAVIS, LLP
Georgia Bar No. 389680
Attorney for Movants

222 Webb Street
Cumming, Georgia 30040
(678) 455-7150 – telephone
(678) 455-7149 – facsimile
patrickj@jarrard-davis.com

/s/ Alex Khoury
Alex Khoury
Special Assistant Legislative Counsel
SMITH, GAMBRELL &
RUSSELL, LLP
Georgia Bar No. 416978
Attorney for Movants

1105 West Peachtree Street
NE Suite 1000
Atlanta, Georgia 30309
404-815-3526 – telephone
404-685-6826 – facsimile
akhoury@sgrlaw.com

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CERTIFICATE OF SERVICE

I hereby certify that, in accordance with LR 5.1(A), (N. D. Ga.), I have this date electronically filed the within and foregoing **MOTION FOR PROTECTIVE ORDER AS TO NON-PARTY SUBPOENAS** in the above-styled action with the Clerk of Court by using the Court's CM/ECF system, which will automatically send notice of same to the following:

Astor H. L. Heaven
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595
202-624-2500

Ezra David Rosenberg

Lawyers' Committee for Civil Rights Under Law
Suite 900
1500 K. Street NW
Washington, DC 20005

Gilda Rae Williams

Advancement Project
1220 L Street NW
Suite 850
Washington, DC 20005

Jacob Canter

Crowell & Moring, LLC - SF CA
3 Embarcadero Center
26th Floor
San Francisco, CA 94111

Jon M. Greenbaum

Lawyers' Committee for Civil Rights Under Law
Suite 900
1500 K. Street NW
Washington, DC 20005

Julie Marie Houk

Lawyers' Committee for Civil Rights Under Law
Suite 900
1500 K. Street NW
Washington, DC 20005

Keith J. Harrison

Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595

Kurt G. Kastorf

Kastorf Law, LLC
1387 Iverson Street NE
Suite 100

Atlanta, GA 30307

LaTonya Sims

Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004

Raija Horstman

Crwell & Moring, LLP - LA C
515 South Flower St
40th Floor
Los Angeles, CA 90071

Shira Liu

Crowell & Moring, LLP - I CA
3 Park Plaza
20th Floor
Irvine, CA 92614

Toni Michelle Jackson

Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595

I further certify that the within and foregoing has been prepared in accordance with Local Rule 5.1(C) and is in a 14-point Times New Roman font.

This 9th day of September, 2022.

/s/ Patrick D. Jaugstetter

Patrick D. Jaugstetter
Special Assistant Legislative Counsel
JARRARD & DAVIS, LLP
Georgia Bar No. 389680
Attorney for Movants

222 Webb Street
Cumming, Georgia 30040
(678) 455-7150 – telephone
(678) 455-7149 – facsimile
patrickj@jarrard-davis.com

/s/ Alex Khoury
Alex Khoury
Special Assistant Legislative Counsel
SMITH, GAMBRELL &
RUSSELL, LLP
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Attorney for Movants

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NE Suite 1000
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404-685-6826 – facsimile
akhoury@sgrlaw.com